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August 17, 2009

Mr. Edward F. Valdespino
Mr. Stephen T. Dennis
STRASBURGER & PRICE, LLP
300 Convent Street, Suite 900
San Antonio, Texas 78205

VIA E-MAIL

Re: C. A. No. 4:09-CV-01392; *Daniela Ruiz v. Bridgestone Americas, Inc. and Bridgestone Americas Tire Operations, LLC d/b/a Bridgestone Firestone North American Tire*; In The United States District Court for the Southern District of Texas – Houston Division.

Dear Counsel:

Per our discussions, please allow this letter to serve to confirm the following agreements between Bridgestone Americas Tire Operations, LLC (“Bridgestone Americas”) and National Unity Insurance Company (“National Unity”) relating to the deposition on written questions served by Bridgestone Americas on National Unity dated July 14, 2009 and National Unity’s Motion to Quash filed in response thereto:

- (1) Bridgestone Americas agrees that National Unity does not have to produce any documents in response to the July 14, 2009 deposition on written questions until Bridgestone Americas provides National Unity with a HIPPA-compliant medical records authorization signed by or on behalf of Daniela Ruiz;
- (2) Following the receipt of a HIPPA-compliant medical records authorization signed by or on behalf of Daniela Ruiz, National Unity will produce to Bridgestone Americas within twenty (20) days all medical records relating to Daniela Ruiz in its file, as well as all other non-privileged documents contained in its file relating to the subject accident that occurred on July 10, 2007;
- (3) Bridgestone Americas agrees that it is not seeking any documents from National Unity protected from disclosure by the attorney-client or work product privileges at this time; and
- (4) National Unity agrees to withdraw its Motion to Quash and to notify the Court that it is passing the scheduled hearing relating to such Motion.

JOHNSON, SPALDING, DOYLE, WEST & TRENT, L.L.P.

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If this letter accurately reflects the agreements of the parties, please sign your name in then space provided below and return the executed letter agreement to our offices.

Thank you for your cooperation and please give me a call if you have any questions.

Very truly yours,

R. Todd Marshall /y

R. Todd Marshall

Agreed:

By:



Edward F. Valdespino
Stephen T. Dennis

Counsel for National Unity Insurance Company

RTM:caj
181-00614